BEFORE THE POSTAL RATE COMMISSION

RECEIVED

SEP 3 | 55 PM '97

POSTAL RATE COMMILTION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FOURTH SET OF INTERROGATORIES FROM UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD (UPS/USPS-T16-23 through 24)

(September 3, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Hatfield (UPS/USPS-T16-23 through 24).

Respectfully submitted,

J6nn E. McKeever Albert P. Parker, II Stephanie Richman

Attorneys for United Parcel Service

SCHNADER HARRISON SEGAL & LEWIS LLP 1600 Market Street, Suite 3600 Philadelphia, Pennsylvania 19103-7286 (215) 751-2200 and 1913 Eye Street, N.W., Suite 600 Washington, D.C. 20006-2106 (202) 463-2900 Of Counsel.

UNITED PARCEL SERVICE 4th SET OF INTERROGATORIES TO UNITED STATES POSTAL SERVICE WITNESS HATFIELD

UPS/USPS-T16-23. Did you perform any studies, analyses or reviews to identify activities and areas where additional Postal Service transportation costs are incurred due to DBMC mail, on average, compared to intra-BMC parcels (not DBMC mail) that are dropshipped to destination BMCs? If yes, please provide copies of all workpapers and results. If no, explain why this has not been done.

UPS/USPS-T16-24. Did you perform any studies, analyses or reviews to identify activities and areas where additional Postal Service transportation costs will be incurred due to the proposed DSCF mail, on average, compared to intra-BMC parcels (not DBMC mail) that are dropshipped at destination SCFs? If yes, please provide copies of all workpapers and results. If no, explain why this has not been done.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

Dated: September 3, 1997 Philadelphia, PA